

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

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YES I CAN LICENSED BEHAVIOR ANALYST
PLLC; TRIUMPH BEHAVIOR SUPPORT LLC,
YES I CAN SERVICES INC; YICIF LLC;
METROPOLITAN MENTAL HEALTH PC;
ZAREPHATH INC.; YIC REALTY AZ LLC;
SIMCHA FELLER; and ROCHEL ITA FELLER,

Civ. A. No. 1:24-cv-7360

NOTICE OF MOTION

Plaintiffs,

-VS-

GREEN TREE CAPITAL, LLC; DELAWHO
HOLDINGS LLC; JONATHAN BRAUN;
YITZCHOK WOLF a/k/a ISAAC WOLF; SARA
BETYAKOV A/K/A SARAH BEITYAKOV;
MATTHEW STAFFORD; ARIEL BOUSKILA;
STEVEN BERKOVITCH; BERKOVITCH &
BOUSKILA, PLLC; ABC CORPORATIONS 1-10;
JOHN DOES 1-10; and JOHN DOE INVESTORS
1-10;

Defendants.

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PLEASE TAKE NOTICE that upon the annexed Declaration with exhibits, the Memorandum of
Law, and all the pleadings and proceedings heretofore had herein, Defendants, BERKOVITCH &
BOUSKILA, PLLC, STEVEN BERKOVITCH, and ARIEL BOUSKILA (collectively “B&B Law”),
will move this Court before the Honorable Paul A. Engelmayer, U.S.D.J., at the United States
Courthouse, 40 Foley Square, New York, NY, 10007, Courtroom 1305 on November 8, 2024 (or such
other date and time set by the Court), for an Order, dismissing this action against B&B Law pursuant to
12(b)(1), (b)(2), (b)(5), and (b)(6), and awarding B&B Law such other and further relief as the Court
deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to SDNY Local Rule 6.1(b), opposition
papers shall be served on or before October 31, 2024, and Reply Papers shall be served on or before
November 7, 2024.

Dated: October 17, 2024

/s/ Christopher R. Murray
Christopher R. Murray, Esq.

Murray Legal, PLLC
Attorneys for Defendants
Ariel Bouskila,
Steven Berkovitch,
Berkovitch & Bouskila, PLLC
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To via ECF:
Counsel for all parties

CERTIFICATE OF SERVICE

CHRISTOPHER R. MURRAY, an attorney duly licensed to practice law in the Courts of the State of New York, declares and affirms under penalty of perjury that on October 17, 2024, I served the Defendant's Notice of Motion, Memorandum of Law, and all supporting documents via E-Mail and ECF on:

JONATHAN E. NEUMAN, ESQ.
Attorney for Plaintiff
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Dated: October 17, 2024

/s/ Christopher R. Murray
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